

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

ROBERT VILLAFUERTE, JOSE MARTINEZ, and RENE GONZALEZ,
Individually and on behalf of all others
similarly situated

Plaintiffs,

V.

**PIONEER ENERGY SERVICES CORP. and
PIONEER COILED TUBING SERVICES
F/K/A GO COIL, LLC**

Defendants

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Civil Action No. 2:14-CV-1

JOINT MOTION FOR ENTRY OF STIPULATED DISMISSAL

TO THE HONORABLE JUDGE NELVA GONZALES RAMOS:

COME NOW, Plaintiffs Robert Villafuerte, Jose Martinez, and Rene Gonzalez, individually and on behalf of all others similarly situated, and Defendants Pioneer Energy Services Corp. and Pioneer Coiled Tubing Services f/k/a Go Coil, LLC (collectively the “Parties”) and move jointly for entry of the attached Stipulated Dismissal under Federal Rule of Civil Procedure 41(a)(2). In support thereof, the Parties respectfully offer the following:

1. Plaintiffs Robert Villafuerte, Jose Martinez, and Rene Gonzalez, individually and on behalf of all others similarly situated, brought suit against Defendants Pioneer Energy Services Corp. and Pioneer Coiled Tubing Services f/k/a Go Coil, LLC alleging Defendants failed to pay them for all hours worked in violation of the Fair Labor Standards Act (“FLSA”), 29 U.S.C. § 201, *et seq.*

2. Plaintiffs Robert Villafuerte, Jose Martinez, and Rene Gonzalez, individually and on behalf of all others similarly situated, no longer desire to prosecute their claims against Defendants Pioneer Energy Services Corp. and Pioneer Coiled Tubing Services f/k/a Go Coil, LLC.

3. A proposed Stipulated Dismissal is attached to this Joint Motion.

WHEREFORE, the Parties respectfully request that the Court grant their Motion and enter the Stipulated Dismissal attached hereto.

Dated: June 4, 2014

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Respectfully submitted,

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**ATTORNEY-IN-CHARGE FOR
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CERTIFICATE OF CONFERENCE

Counsel for Plaintiffs has conferred with counsel for Defendants via electronic mail. Counsel for both parties agree with this Motion for Entry of Stipulated Dismissal and counsel for Defendants further gives her consent for me to sign her name with permission.

/s/ Craig M. Sico

Craig M. Sico

CERTIFICATE OF SERVICE

This pleading was served in compliance with Rule 5 of the Federal Rules of Civil Procedure on June 4, 2014, on counsel listed below via the Court's ECF system and/or email notification:

/s/ Craig M. Sico

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